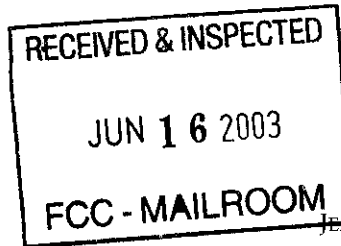




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State of New Jersey

BOARD OF PUBLIC UTILITIES  
TWO GATEWAY CENTER  
NEWARK NJ 07102



JAMES E. MCGREEVEY  
Governor

June 12, 2003

JEANNE M. FOX, Esq.  
President  
Tel: (973) 648-2013

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Re: Comments sought I/M/O Telephone Number Portability, CC Docket No. 95-116,  
Petition for Declaratory Ruling of The Cellular Telecommunications and Internet  
Association.

Dear Secretary Dortch:

In response to the Commission's request for comments, we strongly urge the Commission to affirm and maintain its November 24, 2003 deadline for all wireless carriers to implement local number portability (LNP). The Commission has already granted wireless carriers three extensions, in the last 6 years, of the local number portability due date. No further extensions are warranted or should be granted. Accordingly, we urge the Commission to deny the Cellular Telecommunications and Internet Association's (CTIA) Petition for yet another extension.

The wireless industry has sought to delay the implementation of wireless number portability and has also challenged its necessity, as a pro-competitive measure in CTIA's various filings. However, we join with fellow regulators, legislators and consumers throughout the United States in our common belief that consumers should no longer be denied the ability to choose among competing telephone service providers, whether wireless or wireline, while retaining their existing telephone numbers. We strongly believe that this ability will provide consumers more competitive choices of services, quality and costs. Surveys have shown that up to 70% of consumers will not change their wireless providers if they cannot take their existing telephone numbers with them. Number portability serves as an inducement to carriers to improve service and costs if they want to retain their current customers and acquire new customers. The Commission has already made a determination that wireless LNP will actually promote competition.

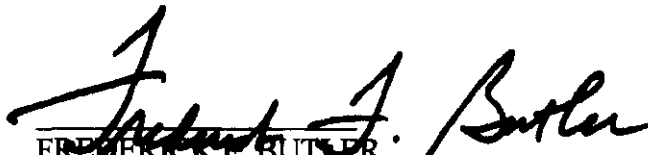
Simply put, local number portability works. It has been available in New Jersey since December 31, 1998 among competitive wireline service providers. Local number portability has contributed, along with other resource optimization measures such as pooling and reclamation, to efficient use of numbering resources. It has also been an important factor in promoting

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competition without upsetting our enhanced 9-1-1 emergency services operation. There is no doubt that through the application of evolving technology, porting intervals as well as network services can be improved upon. We urge the Commission to address legitimate concerns in a timely fashion and carefully consider any actions aimed at further enhancing our telecommunications infrastructure. However, under no circumstances should this result in a delay in wireless number portability. Further delays in the implementation of portability would result in the continuation of a long-standing barrier preventing wireless telephone users from being able to take advantage of competitive alternatives unless they are willing to forego their current telephone numbers.

In sum, as was required of the wireline industry and for the benefit of all telecommunications service consumers, we urge the Commission to require the wireless industry to adhere to the Commission's November 24, 2003 number portability implementation date. We thank you for your consideration of our views.

  
JEANNE M. FOX  
PRESIDENT

  
FREDERICK F. BUTLER  
COMMISSIONER

  
CAROL J. MURPHY  
COMMISSIONER

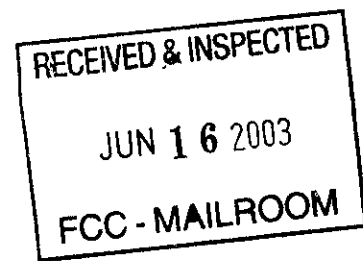
  
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